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June 17, 2011

Honorable Nancy Joseph
United States District Court
Eastern District of Wisconsin
517 E. Wisconsin Avenue
Milwaukee, Wisconsin 53202

RE: *United States v. Roland Flath*
Case No. 11-Cr-69

Dear Judge Joseph:

Counsel for Roland Flath asks the Court to extend the deadline to reply to the government's responses to the defendant's motions to dismiss, suppress, and for a bill of particulars from June 6 to June 17, 2011. The bases for this request are as follows.

This Court previously extended the deadline for Flath to reply from June 6 to June 17. Counsel explained that he needed additional time because the government's responses total about 100 pages and the case raises complex issues regarding criminal, constitutional, and international law.

Despite what counsel believes are diligent efforts to reply to the government's response by June 17, counsel is unable to meet the deadline because he was preparing for a trial in *United States v. Almendarez*, Case No. 08-Cr-231, which was to begin June 20 in front of the Honorable J.P. Stadtmueller. Although the case settled late yesterday, counsel had been preparing the case assuming that it would go to trial next week. In addition, counsel filed objections to this Court's recommendation to deny the defendant's motions to suppress in *United States v. Tellefsen*, Case No. 11-Cr-43, yesterday with the Honorable Rudolph T. Randa; and counsel must file an objection to the magistrate judge's recommendation to deny in part the defendant's motion to suppress in *United States v. Camacho*, Case No. 09-Cr-

284 by June 20 with Judge Randa. Counsel also needs to respond by June 24 to the government's objection to the magistrate judge's recommendation to grant the defendant's motion to suppress in *United States v. Rock*, Case No. 10-Cr-247.

Counsel does not believe extending the reply deadline will affect scheduling matters in this case because no trial date has been set.

Thank you for your attention to this matter.

Sincerely,

/s/ **Brian P. Mullins**
Counsel for Roland Flath